IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ENERGY AUTOMATION SYSTEMS, INC.,	)	
Plaintiff,	)	
v.	)	**CIVIL ACTION NO. 3-06-1079**
XCENTRIC VENTURES, LLC, d/b/a BADBUSINESS BUREAU and/or BADBUSINESSBUREAU.COM and/or RIP-OFF REPORT and/or RIPOFFREPORT.COM, and EDWARD MAGEDSON a/k/a ED MAGEDSON,	)	**Judge Aleta Trauger** **Magistrate Judge Juliet Griffin** **JURY DEMAND**
Defendants.	)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF ITS MOTION TO LIFT STAY ON DISCOVERY FOR LIMITED PURPOSE OF DISCOVERING JURISDICTIONAL FACTS

Pursuant to Local Rule 7.01(b), Plaintiff Energy Automation Systems, Inc. ("EASI") moves the Court for leave to file a Reply in support of its Motion to Lift the Stay on Discovery for the Limited Purpose of Discovering Jurisdictional Facts (Doc. No. 24). A copy of EASI's Reply is attached to this Motion as Exhibit A.

Defendant Xcentric Ventures, LLC's ("Xcentric") response (Doc. No. 31) contains inaccuracies that necessitate a reply and clarification. Specifically, instead of addressing EASI's request for discovery, Xcentric argues that no "factual disputes" remain and the Court should dismiss the suit. EASI should be provided the opportunity to address Xcentric's reliance on an inappropriate standard for the instant motion. EASI respectfully requests the opportunity to

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clarify and further demonstrate the merit of its position. Accordingly, EASI asks that the Court grant it leave to file the attached Reply.

Respectfully submitted,

s/ W. Russell Taber
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CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing document was made via electronic mail using the Electronic Filing System upon the following:

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this 16th day of May, 2007.

s/ W. Russell Taber